

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 16-2346-JJO

UNITED STATES OF AMERICA

vs.

MARLEN MANUKYAN,

Defendant.

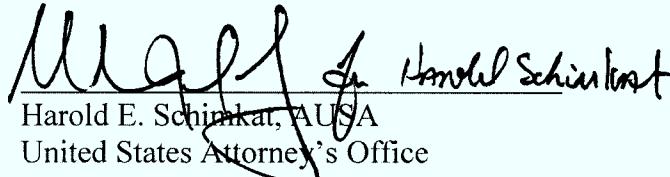
CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to October 14, 2003? _____ Yes No
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to September 1, 2007? _____ Yes No

Respectfully submitted,

WIFREDO A. FERRER
UNITED STATES ATTORNEY

BY:


Harold E. Schimkat, AUSA
United States Attorney's Office
Court No. A5500567
99 NE 4th Street, 4th Floor
Miami, Florida 33132-2111
Tel. (305) 961-9298
Harold.schimkat@usdoj.gov

UNITED STATES DISTRICT COURT
for the
Southern District of Florida

United States of America

v.

Marlen Manukyan,

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Case No. 16-2364 TJO

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 08/01/2013 -- 09/16/2013 in the county of Miami - Dade & Broward in the
Southern District of Florida, the defendant(s) violated:

Code Section
18 U.S.C. 1349; and
18 U.S.C. 1956(h)

Offense Description
Conspiracy to commit bank fraud; and
Conspiracy to commit money laundering.

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.

Complainant's signature

Ira S. Fair, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 03/22/2016

City and state: Miami, Florida

Judge's signature

John J. O'Sullivan

Printed name and title

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, IRA S. FAIR, Special Agent with the Federal Bureau of Investigation, having been first duly sworn, do hereby depose and state as follows:

Introduction

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been for approximately eight years. In this capacity, I am authorized to conduct investigations into criminal violations committed against the United States including, but not limited to, identity theft, access device fraud, bank fraud, wire fraud, mail fraud, and money laundering. I am authorized to apply for and execute arrest warrants for offenses enumerated in Title 18 of the United States Code and to execute search warrants.

2. I make this affidavit in support of a criminal complaint charging MARLEN MANUKYAN with conspiracy to commit bank fraud, in violation of Title 18 U.S.C. § 1349, and conspiracy to commit money laundering, in violation of 18 U.S.C. § 1956(h) (specifically, conspiracy to violate 18 U.S.C. §§1956(a)(1)(B)(i) and (a)(2)(B)(i)).

3. This affidavit is based on information I have learned through my own investigation including information provided to me by other law enforcement officers and other third parties. The facts set forth herein do not constitute all the facts known to law enforcement about this matter at this time. Rather, I have included only those facts that I believe are relevant to establish probable cause in support of the attached criminal complaint.

Probable Cause

4. In March 2014, the FBI was conducting an investigation into a group of Russian and other eastern European individuals that were engaged in various criminal schemes in South Florida and elsewhere including auto and boat theft. Pursuant to that investigation, law enforcement conducted a traffic stop of a vehicle in order to execute an arrest warrant for an

individual wanted as part of the FBI's investigation. After stopping the vehicle, law enforcement learned that the person they were looking for was not inside the vehicle. Instead, the vehicle was being driven by an individual hereinafter referred to as Subject #1. Agents with the Department of Homeland Security detained Subject #1 because Subject #1 was residing in the United States without lawful status. Subsequently, after further investigation in this case, Subject #1 was convicted of identity theft related charges in federal district court in the Southern District of Florida. Subject #1 is currently in the custody of the Bureau of Prisons.

5. Following his arrest, Subject #1 began to cooperate with federal law enforcement. During a number of interviews, Subject #1 explained that he worked with a criminal enterprise that was involved in bank fraud, money laundering, and tax refund fraud in south Florida and elsewhere. As part of the scheme, the leader of the group in the United States had two different individuals open up post office boxes in different locations in south Florida in order to receive fraudulent debit cards from different banks and to receive statements for business and personal bank accounts that were opened in order to launder the criminal proceeds of various schemes. One mailbox was opened in Hallandale Beach, Florida, and the other mailbox was located at 2728 Davie Boulevard, #86, Fort Lauderdale, Florida.¹

6. During the course of the investigation, your affiant learned of multiple bank accounts at Popular Community Bank, City National Bank of Florida, TD Bank, Wells Fargo, and Bank of America, all opened by MANUKYAN in false names using stolen identities, and utilized to commit fraudulent activities. The following paragraphs (7-14) include a brief summary of a few bank accounts identified in this investigation as fraudulent.

¹ Special Agent Fair interviewed Subject #1 on numerous occasions. After each debriefing, Special Agent Fair conducted follow-up investigations in an attempt to corroborate the information provided by Subject #1. To this day, Subject #1's information has been corroborated and he has been truthful. Subject #1's sentence will be reduced if his cooperation rises to the level of substantial assistance.

7. On August 1, 2013, MANUKYAN, using a false identity, opened checking account #3840 in the name of a person with the initials M.G. at the City National Bank branch located at 1995 E. Hallandale Beach Boulevard, Hallandale Beach, Florida. The sole signatory on the checking account is listed as M.G. The address of record on the account is the same as the mailbox address – 2728 Davie Boulevard, #86, Fort Lauderdale, Florida – referenced above. As proof of identity, the City National Bank documents contain a photocopy of a fake Pennsylvania driver's license in the name of M.G. with M.G.'s real date of birth, but MANUKYAN's photograph. Below the copy of the driver's license is handwritten contact information for the new account (address and telephone number) and M.G.'s true social security number. A fraudulent AT&T phone bill in the name of M.G. with the same mailbox address was also used when opening the account. Law enforcement has interviewed M.G. who stated that he has been the victim of identity theft on multiple occasions and that he has never given anyone permission to use his social security number.

8. On August 2, 2013, MANUKYAN, using a false identity, attempted to open a business checking and savings account at Amtrust Bank located at 9592 Harding Avenue, Surfside, Florida. As proof of identity, MANUKYAN provided the same fraudulent Pennsylvania driver's license bearing the name of M.G. with MANUKYAN's picture that he had used at City National Bank, along with an AT&T statement, and an FPL bill with the same mailbox address referenced earlier. However, when the bank manager entered the social security number provided by MANUKYAN into the bank's computer system, a different person came up who already had an established account with a different name. The bank manager told MANUKYAN that he was going to make a copy of the Pennsylvania driver's license, but when he returned he observed MANUKYAN running out of the bank and jumping into a vehicle.

Your affiant now has possession of the fraudulent Pennsylvania identification in the name of M.G. that MANUKYAN attempted to use to open the account.

9. On August 8, 2013, MANUKYAN, using a false identity, opened bank accounts #1658 and #4985 at TD Bank located at 20495 Biscayne Boulevard, Aventura, Florida. The sole signatory listed on the account opening documents is a person with the initials A.A. The address of record on the accounts is the same as the mailbox address referenced earlier in this affidavit. As proof of identity, the TD Bank signature card contains the same driver's license number and expiration date as a fake Pennsylvania driver's license in the name of A.A. used by MANUKYAN to open a bank account at Popular Community Bank the following day (TD Bank did not photocopy the fake driver's license). Photographs from TD Bank's surveillance cameras on August 8, 2013, depict an individual that appears to be MANUKYAN sitting at a customer service representative's desk. Law enforcement has interviewed A.A. who stated that he has never lived in south Florida and that he never gave anyone permission to use his identity.

10. On August 9, 2013, MANUKYAN, using a false identity, opened accounts #1692 and #0241 in the name of A.A. at Popular Community Bank located at 13490 N.W. 7th Avenue, North Miami Beach, Florida. On the Popular Community Bank account opening documents, the sole signatory is listed as A.A. As proof of identity, the Popular Community Bank documents contain a photocopy of a fake Pennsylvania driver's license in the name of A.A. with A.A.'s real date of birth, but MANUKYAN's photograph.

11. On August 9, 2013, MANUKYAN, using a false identity, opened business account #8352 in the name of ZRF INTERNATIONAL SERVICES at the Wells Fargo branch located at 1201 East Hallandale Beach Boulevard, Hallandale Beach, Florida. On the Wells Fargo account opening documents, the sole signatory is listed as A.A. The address of record on

the account is the same as the mailbox address referenced earlier in this affidavit. As proof of identity, the Wells Fargo signature card contains the same driver's license number and expiration date as the fake Pennsylvania driver's license in the name of A.A. with MANUKYAN's photograph used to open the Popular Community Bank accounts the day before. Wells Fargo, however, did not make a photocopy of the fake driver's license.

12. On September 12, 2013, the ZRF INTERNATIONAL SERVICES account received a wire transfer in the amount of \$39,960 from K.W. in Sugarland, Texas. Prior to receiving this wire transfer, the balance in the ZRF INTERNATIONAL SERVICES account was \$199.74. On September 16, 2013, a \$39,000 international wire transfer was sent from the ZRF INTERNATIONAL SERVICES account to a bank account in the name of P.V. in Moscow, Russia.

13. Law enforcement has since interviewed K.W. regarding these transactions. K.W. informed law enforcement that she and her husband were both retired and had attempted to purchase a used Recreational Vehicle (RV) on the internet through craigslist.com. The seller of the RV – an individual allegedly named "Frank Mater" who had some sort of a Scandinavian accent – instructed them to use an alleged web based escrow company to complete the purchase. K.W. stated that after wiring approximately \$40,000 to the "escrow account," she and her husband had a few more email and telephone communications with Mater who then ceased communicating with them. K.W. and her husband never received the vehicle that she believed she had purchased through craigslist.

14. A review of the TD Bank, Popular Community Bank, and Wells Fargo bank accounts set up by MANUKYAN utilizing the identity of A.A. has revealed transactions that are indicative of income tax fraud using stolen identities. Specifically, each of these accounts

received multiple transfers from H&R Block during the same time period. Each transaction was for relatively small dollar amounts of no more than a few thousand dollars each. The money received in these accounts from H&R Block was then, in large part, withdrawn through debit card transactions. Your affiant submits that this activity is consistent with Source #1's information that MANUKYAN and other individuals working with him were engaged in income tax fraud during the relevant time period. Investigation in this respect is ongoing.

Conclusion

15. Based on the foregoing, your affiant respectfully submits that there is probable cause to believe MANUKYAN did knowingly and willfully engage in a conspiracy to commit bank fraud, in violation of 18 U.S.C. § 1349, and conspiracy to commit money laundering, in violation of 18 U.S.C. § 1956(h) (specifically, conspiracy to violate 18 U.S.C. § 1956(a)(1)(B)(i) and (a)(2)(B)(i)).²

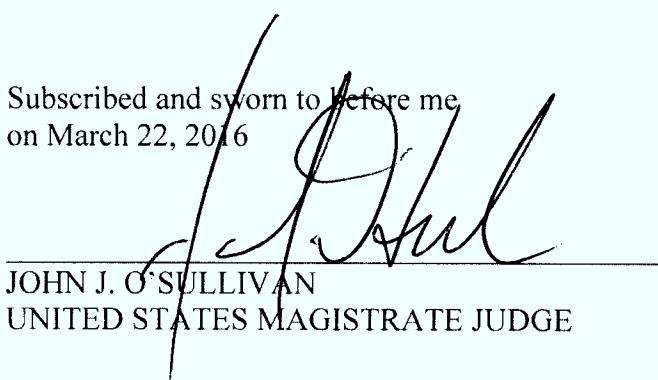
FURTHER YOUR AFFIANT SAYETH NOT.

Respectfully submitted,



IRA S. FAIR, SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

Subscribed and sworn to before me
on March 22, 2016



JOHN J. O'SULLIVAN
UNITED STATES MAGISTRATE JUDGE

² The underlying specified unlawful conduct in this case is wire fraud, in violation of 18 U.S.C. § 1343, based on the scheme to defraud the victims who believed that they were purchasing a recreational vehicle on the internet.